

KENT N. DOLL JR. – WSBA # 40549
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Attorney for Defendant

Honorable Wm. Fremming Nielson

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

vs.

RANDY D. MCREYNOLDS.

Defendant.

Case No. 2:21-CR-00028-WFN

**DEFENDANT RANDY
MCREYNOLDS' MOTION FOR
EXTENSION OF TIME TO FILE
JUDGMENT OF ACQUITTAL
PURSUANT TO RULE 29 AND
NEW TRIAL PERSUANT TO
RULE 33**

I. MOTION

Comes now Defendant, through his counsel of record, Kent Neil Doll, Jr., and requests an extension of time to file for a Motion for a Judgment of Acquittal pursuant to Rule 29 and New Trial pursuant to Rule 33. This Motion is based upon the declaration below.

DEFENDANT RANDY MCREYNOLDS' MOTION
FOR EXTENSION OF TIME TO FILE JUDGMENT
OF ACQUITTAL PURSUANT TO RULE 29 AND
NEW TRIAL PURSUANT TO RULE 33: 1

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II. DECLARATION

1. My name is Kent Doll. I am the court appointed attorney for Mr. Randy McReynolds.
2. On June 30, 2021, a jury found Mr. McReynolds guilty of all charges set forth in the Indictment.
3. On July 1, 2021, I conferred with Crystal Hicks, the court reporter for the trial. She has informed me that she will not be able to get me the transcripts of the trial and pre-trial hearings within 3 days. She informed me she might be able to get me the transcripts in 7 days, however she would prefer 14 days.
4. Additionally, my own scheduling will interfere with my ability to file these motions. I have a Washington state court matter set for trial on July 19, 2021.
5. I therefore request an extension of time to file a Motion for a New Trial and/or a Motion of Acquittal. Specifically, I request that the deadline for these motions be August 3, 2021.

DEFENDANT RANDY MCREYNOLDS' MOTION
FOR EXTENSION OF TIME TO FILE JUDGMENT
OF ACQUITTAL PURSUANT TO RULE 29 AND
NEW TRIAL PURSUANT TO RULE 33: 2

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1 DATED this 1st day of July, 2021
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3 By: s/Kent Neil Doll, Jr.
4 State Bar No. 40549
5 Attorney for Defendant
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32 DEFENDANT RANDY MCREYNOLDS' MOTION
33 FOR EXTENSION OF TIME TO FILE JUDGMENT
34 OF ACQUITTAL PURSUANT TO RULE 29 AND
35 NEW TRIAL PURSUANT TO RULE 33: 3

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CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of July, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Michael J. Ellis

Tim Olms

I hereby further certify that I have caused to be served a true and correct copy of the foregoing document(s) on the non-CM/ECF participants as indicated:

None

- Hand Delivered
- U.S. Mail
- Overnight Mail
- Facsimile

/s/Kent N. Doll, Jr.
of Kirkpatrick & Startzel, P.S.

DEFENDANT RANDY MCREYNOLDS' MOTION
FOR EXTENSION OF TIME TO FILE JUDGMENT
OF ACQUITTAL PURSUANT TO RULE 29 AND
NEW TRIAL PURSUANT TO RULE 33: 4

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